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Attorney for Adversary Proceeding Defendants
Leslie Klein, an individual; The Second Amended Klein Living Trust, a trust;
The Marital Deduction Trust of Erika Klein, a trust; The Survivor's Trust of
Leslie Klein, a trust; and Barbara Klein, an individual

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

IN RE

LESLIE KLEIN,

Debtor.

Case No.: 2:23-bk-10990-NB

Hon. Neil W. Bason

Chapter 11

**STATEMENT OF ISSUES –
MOTION FOR TURNOVER OF
JUNE STREET PROPERTY**

Eric J. Olson, attorney for Adversary Proceeding Defendants, Leslie
Klein, an individual; The Second Amended Klein Living Trust, a trust; The
Marital Deduction Trust of Erika Klein, a trust; The Survivor's Trust of Leslie
Klein, a trust; and Barbara Klein, an individual, states the following
Statement of Issues on his Appeal:

- 1 1. Whether the Bankruptcy Court erred in granting Motion of Chapter 11
2 Trustee seeking turnover of possession of the property located at 322
3 N. June Street, Los Angeles, California to the Trustee.
- 4
5 2. Whether the Trustee has established title as against the Credit Trust
6 and the four children of Erika and Leslie Klein, parties named in the
7 Second Amended Klein Living Trust, where he chose not to join them
8 in the Quiet Title Action.
- 9
10 3. Whether the Trustee has established title as against the three parties
11 named only as "trusts".
- 12
13 4. Whether the Trustee has insurable title to the property including by
14 reason of the foregoing.
- 15
16 5. Whether it would be in the best interest of the Trustee, at least as
17 long as it does not have an insurable title, to seek possession of the
18 property for incurring cost and other burdens of ownership.
- 19
20

21 Dated: March 27, 2025



Eric J. Olson
Attorney for Adversary Proceeding
Defendants

In re: LESLIE KLEIN
Debtor.

Chapter 11
Case No.: 2:23-bk-10990-NB

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 301 East Colorado Boulevard, Suite 520, Pasadena, California 91101.

A true and correct copy of the foregoing document described as "**Statement of Issues**" will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING

("NEF") Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On 03/27/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

[x] Service information continued on attached page.

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicated method for each person or entity served): On 03/27/2025, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

[x] Service information continued on attached page.

In re: LESLIE KLEIN
Debtor.

Chapter 11
Case No.: 2:23-bk-10990-NB

I declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct.

03/27/2025

Date

Jasper Pantaleon

Type Name

/s/ Jasper Pantaleon

Signature

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)":

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STATEMENT OF ISSUES – MOTION FOR TURNOVER OF JUNE STREET PROPERTY

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II. SERVED BY UNITED STATES MAIL:

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